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15 Attorneys for Defendants
16 LG CHEM, LTD, and
LG CHEM AMERICA, INC.

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **OAKLAND DIVISION**

20 IN RE: LITHIUM ION BATTERIES
21 ANTITRUST LITIGATION

Master File No. 4:13-md-02420-YGR
MDL NO. 2420

Case No. 4:15-cv-02987-YGR

22 This Document Relates to:

23 DELL INC. and DELL PRODUCTS L.P.,
24 Plaintiffs,
25 v.

26 LG CHEM LTD. *et al.*
27 Defendants.

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE LG CHEM
DEFENDANTS' TIME TO RESPOND TO
DELL'S COMPLAINT**

Individual Action Plaintiffs Dell Inc. and Dell Products L.P. (collectively “Dell”) and Defendants LG Chem Ltd. and LG Chem America, Inc. (collectively “LG Chem”), together “the Parties,” through their respective counsel of record, hereby Stipulate as follows:

WHEREAS, the Parties entered into a stipulation on August 5, 2015 (ECF No. 758) (“Stipulation”) to waive service of Dell’s complaint filed on June 26, 2015 (“Complaint”) and to extend LG Chem’s deadline to respond to the Complaint until October 21, 2015; and

WHEREAS, the Court entered an Order granting the Stipulation on August 10, 2015 (ECF No. 768), thereby setting the deadline for LG Chem to respond as October 21, 2015;

WHEREAS the Parties have met and conferred and desire to extend the deadline for LG Chem to respond to Dell’s Complaint to November 18, 2015;

WHEREFORE, it is stipulated:

1. The deadline for LG Chem to respond to the Dell Complaint shall be extended to November 18, 2015.

2. The Parties agree that this extension will not be used to prejudice Dell’s efforts to seek discovery in the above referenced action.

3. The parties agree that LG Chem does not waive and continues to preserve all of its defenses under the Federal Rules of Civil Procedure, including potential Rule 12 motions.

IT IS SO STIPULATED.

1 Dated: October 20, 2015

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3 Respectfully submitted,

4 AKIN GUMP STRAUSS HAUER & FELD LLP ALSTON & BIRD

5 By /s/ Reginald Steer

By /s/ Rodney J. Ganske

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ATTESTATION

I, Mollie McGowan Lemberg, hereby attest, pursuant to Northern District of California Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 20, 2015

By: /s/ Mollie McGowan Lemberg
Mollie McGowan Lemberg

IT IS SO ORDERED.

This Order terminates Docket No. 907 in the Master File and Docket No. 45 in Case No. 15-2987.

Dated: October 26, 2015


The Honorable Yvonne Gonzalez Rogers
UNITED STATES DISTRICT JUDGE